

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZION MITCHELL,

Defendant.

INDICTMENT

CASE NO.

3:23 CR 570

Title 18, United States Code,
Sections 922(a)(6) and 932(b)(2)

JUDGE JAMES B. CLAY

MAG JUDGE CLAY

COUNT 1

(False Statement During Purchase of Firearms, 18 U.S.C. § 922(a)(6))

The Grand Jury charges:

1. From on or about May 14, 2021, through on or about August 2, 2023, in the Northern District of Ohio, Western Division, Defendant ZION MITCHELL, in connection with the acquisition of firearms, to wit:

Date	Location	Firearm	Serial Number
May 14, 2021	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 19 9mm pistol	AFHH077
May 25, 2021	XXXXXX Crossroads Pkwy., Rossford, Ohio	Smith & Wesson .40 caliber pistol	HAH07698
July 8, 2021	XXXXXX Crossroads Pkwy., Rossford, Ohio	Taurus 9mm pistol	ACD761557
September 21, 2021	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 48 9mm Pistol	BTYG641
January 10, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Taurus .40 caliber pistol	ACK409847
March 4, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	HS Produkt/Springfield Armory XDS-9 9mm Pistol	BA590518

ORIGINAL

March 11, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 19 9mm Pistol	BVCB279
May 21, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	SDS Zigana PX-9 9mm Pistol	T0620Z1BM07260
July 24, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Taurus 9mm pistol	ADD284503
August 3, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Masterpiece Arms Defender 9mm Pistol	FX33225
October 22, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 31 .357 cal Pistol	BXUY247
October 30, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	American Tactical Omni 5.56 cal Pistol	NS367169
October 30, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 23 .40 cal. Pistol	BUCV692
January 24, 2023	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 29 10mm Pistol	BYAL177
February 17, 2023	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock .40 caliber pistol	BXZZ015
July 30, 2023	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 22 .40 Cal Pistol	BVVA228
August 2, 2023	XXXX Woodville Rd., Oregon, Ohio	Ruger 57 5.7 cal. Pistol	643-48673

from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false or fictitious oral or written statement, which statement was intended and likely to deceive the licensed dealer as to a fact material to the lawfulness of such sale of the said firearms to the defendant under Chapter 44 of Title 18 in that the defendant represented a false residential address, that he was the actual transferee or buyer of the firearms, and that he did not intend to sell or otherwise dispose of the firearms in furtherance of any felony or other offense punishable by imprisonment for a term of more than one year, or a drug trafficking offense, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT 2

(Straw Purchasing of Firearms, 18 U.S.C. § 932(b)(2))

The Grand Jury further charges:

2. From on or about May 14, 2021, through on or about August 2, 2023, in the Northern District of Ohio, Western Division, Defendant ZION MITCHELL, did knowingly purchase firearms, to wit:

Date	Location	Firearm	Serial Number
May 14, 2021	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 19 9mm pistol	AFHH077
May 25, 2021	XXXXXX Crossroads Pkwy., Rossford, Ohio	Smith & Wesson .40 caliber pistol	HAH07698
July 8, 2021	XXXXXX Crossroads Pkwy., Rossford, Ohio	Taurus 9mm pistol	ACD761557
September 21, 2021	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 48 9mm Pistol	BTYG641
January 10, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Taurus .40 caliber pistol	ACK409847
March 4, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	HS Produkt/Springfield Armory XDS-9 9mm Pistol	BA590518
March 11, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 19 9mm Pistol	BVCB279
May 21, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	SDS Zigana PX-9 9mm Pistol	T0620Z1BM07260
July 24, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Taurus 9mm pistol	ADD284503
August 3, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Masterpiece Arms Defender 9mm Pistol	FX33225
October 22, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 31 .357 cal Pistol	BXUY247
October 30, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	American Tactical Omni 5.56 cal Pistol	NS367169
October 30, 2022	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 23 .40 cal. Pistol	BUCV692
January 24, 2023	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 29 10mm Pistol	BYAL177
February 17, 2023	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock .40 caliber pistol	BXZZ015
July 30, 2023	XXXXXX Crossroads Pkwy., Rossford, Ohio	Glock 22 .40 Cal Pistol	BVVA228

August 2, 2023	XXXX Woodville Rd., Oregon, Ohio	Ruger 57 5.7 cal. Pistol	643-48673
-------------------	-------------------------------------	--------------------------	-----------

in or otherwise affecting interstate or foreign commerce, on behalf of, or at the request or demand of unknown individuals, knowing or having reasonable cause to believe that the unknown individuals intended to use, carry, possess, or sell or otherwise dispose of the firearm in furtherance of a felony or a drug trafficking crime, in violation of Title 18, United States Code, Section 932.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.